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Before the
FEDERAL COMMUNICATIONS COMMISSION

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This NPRM should be approved, with the following additions and/or changes:

- 1) Amateur operations' power limits should be set on a spectral density basis. I propose 1 milliwatt per Hertz as an appropriate spectral density.
- 2) I see no need to limit communications to 100 kHz channels.
- 3) No baud rate restrictions are required.
- 4) Digital voice should be encouraged in this segment. The rule should be that digital modulation methods are required, regardless of the information content (data, voice, video, etc.).
- 5) Spread Spectrum communications should be permitted and encouraged in this segment. True CDMA (Code Division Multiple Access) techniques should be permitted, that is, arbitrary PN codes should be allowed.
- 6) The propagation characteristics of the 220 MHz band argue for